

Safety Evaluation Number¹: SE-W375-00-00010 Revision No: 0

ABCN Number: ABCN-W375-00-00014

Safety Evaluation Subject: Reliability, Availability, Maintainability, and Inspectability (RAMI)

PART I: DESCRIPTION OF THE PROPOSED REVISION, BACKGROUND, AND SCHEDULE

1. Describe the proposed revision (including credible failure modes, if applicable).

Revise the implementing standards for safety criteria 4.2-3 and 4.4-4 for RAMI from ISMP sections 1.3.10, 3.7.1, and 3.13 to a new appendix in the SRD that incorporates the requirements of ISMP section 3.13. The references to ISMP section 1.3.10 and 3.7.1 are redundant to the existing references to SRD Appendix A and ISMP section 3.13.. This change is administrative in nature and does not impact any failure modes.

2. Identify the affected Authorization Basis (AB) documents and perform a comparison and assessment of the revision against the AB.

The affected portions of the authorization basis are Safety Criteria 4.2-3 and 4.4-4 which currently reference various sections of the ISMP as the implementing standards for RAMI. The change will delete the ISMP references as the implementing standards and replace them with a new appendix to the SRD as the ad hoc implementing standard.

The assessment of the change against the AB is contained in section II below.

3. List the references used for the safety evaluation.

BNFL-5193-SRD-01, Revision 2e, TWRS-P Safety Requirements Document

BNFL-5193-ISM-01, Revision 4b, TWRS-P Integrated Safety Management Plan

DOE/RL-98-01, DOE Regulatory Unit Evaluation Report of the BNFL Inc. Safety Requirements Document

DOE/RL-98-20, DOE Regulatory Unit Evaluation of BNFL Inc. Safety Requirements Document, Revision 1

4. Describe the planned revision implementation schedule.

The change will be incorporated into the SRD within 30 days of RU approval.

¹ The Safety Evaluation Number shall be obtained from Project Document Control.

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PART II: REGULATORY IMPACT OF PROPOSED AB REVISION

The following questions are to be answered as part of the safety evaluation, to determine if the proposed AB revision (and the proposed initiating change if applicable) requires prior RU approval.

- | | <u>YES</u> | <u>NO</u> |
|---|-------------------------------------|--------------------------|
| 1. Does the revision involve the deletion or modification of a standard previously identified or established in the approved SRD? | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

JUSTIFICATION:

Safety Criteria 4.2-3 and 4.4-4 currently reference portions of the ISMP as implementing standards. This change will revise the implementing standard for RAMI to a new appendix in the SRD. The reference to ISMP section 1.3.10 (Classification of Structures, Systems, and Components) in SC 4.2-3 will be deleted, as it is redundant to the requirements of SRD Appendix A which is also referenced as an implementing standard. ISMP section 3.7.1 (Passive Features) will also be deleted from SC 4.2-3 as it is redundant to ISMP section 3.13, which is being replaced by the new SRD appendix, and SRD Appendix A.

- | | | |
|---|--------------------------|-------------------------------------|
| 2. Does the revision result in a reduction in commitment currently described in the AB? | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
|---|--------------------------|-------------------------------------|

JUSTIFICATION:

No. ISMP section 3.13 is being reproduced in the new SRD appendix as the implementing standard for RAMI. The references to ISMP sections 1.3.10 and 3.7.1 are redundant to other implementing standards cited in SC 4.2-3 as discussed in the attachment to this safety evaluation.

- | | | |
|---|--------------------------|-------------------------------------|
| 3. Does the revision result in a reduction in the effectiveness of any program, procedure, or plan described in the AB. | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
|---|--------------------------|-------------------------------------|

JUSTIFICATION:

No. The requirements for RAMI are unchanged by this change to the SRD.

Note: Guidance on defining the terms and responding to the above questions is provided in K70C528, Code of Practice for Managing Changes to the Authorization Basis, Appendix 6.

If all the answers to the above questions are no, then the change can be made without prior RU approval.

If any of the above answers is yes, then RU approval is required prior to implementation of the AB revision (and the initiating change if applicable). An ABAR shall be prepared to obtain RU approval (see K70C528, Appendix 7.)

PART III: SAFETY EVALUATION CONCLUSION

- ☐ All PART II questions are answered No. Therefore, RU approval is NOT required prior to implementing the proposed AB revision (and initiating change where applicable).
- ☒ At least one PART II question is answered Yes. Therefore, RU approval IS required prior to implementing the

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proposed AB revision (and initiating change where applicable). Issuance of an ABAR is required to obtain RU approval.

Evaluator/Originator

Date

Reviewer²

Date

Radiation Safety and Regulatory Manager

Date

Chair, Project Safety Committee³

Date

RPP-WTP General Manager³

Date

² The reviewer should be a person from the same department as the Evaluator/Originator and at least as qualified as the Evaluator/Originator to conduct safety evaluations.

³ This signature required if Safety Evaluation concludes AB change can be made without RU prior approval. If RU approval (ABAR) is required, PSC and GM signatures occur on the ABAR.